

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Crown Commercial Real Estate
and Development, Inc.

v.

Commonwealth Edison Company

Complaint as to billing/charges in
Chicago, Illinois.

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07-0473

RESPONSES TO (MOVANT) COMPLAINANT'S DATA REQUESTS

To: Mr. Scott J. Linn, Esq.

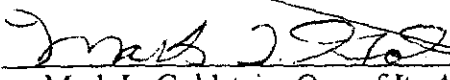
Crown Commercial Real Estate and Development, Inc.
620 Butternut Trail
Frankfort, IL 60423

Attached are the Commonwealth Edison Company Responses to Movant's First Set of Interrogatories Directed to Respondent and Movant's Request to Produce Documents.

Dated: November 6, 2007

Respectfully submitted,
COMMONWEALTH EDISON COMPANY

By:


Mark L. Goldstein, One of Its Attorneys

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MOVANT'S FIRST SET OF INTERROGATORIES DIRECTED TO RESPONDENT

1. For each person answering these interrogatories, state the person's name, business address, occupation and current job title or position.

ComEd
Paul Unruh
Sr. Supervisor, Revenue Protection
1919 Swift Dr.
Oak Brook, Illinois 60523

2. Specify all persons who have knowledge of any facts related directly to the allegations of Movant's Complaint, including for each such person(s):

(a) the person's name and current address;

Charles Archer
1919 Swift Dr.
Oak Brook, Illinois 60523

(b) the name and current address of that person's current employer;

ComEd
1919 Swift Dr.
Oak Brook, Illinois 60523

(c) the name and current address of that person's employer at the time that person obtained knowledge of the facts.

Same as above

3. Specify the exact date that the Respondent should have established an account for Movant on the Property known as 3939 West Ogden Avenue, Chicago, IL 60631 ("Property").

N/A - it is the Movant's responsibility to call the Respondent to establish an account.

4. Specify the exact date that Respondent established an account for Movant with regard to the Property.

4/20/2007

5. Specify the exact date that Respondent installed a billing meter on the Property.

N/A – Meter 117950039 was shipped from System Meter to Chicago South on 2/10/2003

6. Specify all dates that the billing meter on the Property was read by an employee or representative of Respondent for the purpose of billing charges to Movant's account.

10/20/2004, 05/05/2006, 02/23/2007, 5/2/2007 and monthly thereafter.

7. Specify all dates that the Respondent has sent out billing notices to Movant with regard to Movant's account.

Rev :Pro letter dated 4/23/2007

First Regular bill dated 5/2/2007 and monthly thereafter

8. State any and all reasons why Respondent did not send out a billing notice for the account to Movant until June, 2007.

Incorrect – first bill was dated May, 2007.

9. Specify the standard and customary procedures used by Respondent in: (1) establishing billing accounts for its customers; and (2) whether these standard and customary procedures were used in establishing the billing account for Movant.

Movant calls Respondent to establish service. No, these processes were not followed because Movant did not call to establish service.

10. Specify the standard and customary methods used by Respondent to: (1) calculate the amounts billed to its customers; and (2) whether these standard and customary procedures were used in calculating the amounts billed to Movant and which are in dispute.

Meters are read monthly and billed. Process was not followed by ComEd due to meter not being connected to premise in billing system.

11. State the legal authority (s) that gives Respondent the right to bill Movant for the amounts which are in controversy.

Illinois Administrative Code, Part 280, Section 100